



Application Form

BAXTER FENWAL DIVISION, MARICAO

Name of facility*

BAXTER HEALTHCARE CORPORATION

Name of parent company (if any)

ROAD 357 Km. 0.8

Street address

PO BOX 832

Street address (continued)

MARICAO PR 00606

City/State/Zip code

Give us information about your contact person for the National Environmental Performance Track Program.

Name Mr./Mrs./Ms./Dr. Mr. JOAQUIN AYALA

Title ENVIRONMENTAL MANAGER

Phone 787 838-3000

Fax 787-838-2110

E-mail joaquin_ayala@baxter.com

Facility/Company Website www.baxter.com

* If you are applying for multiple facilities, you must call 1-888-339-PTRK(7875)

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- ♦ Provide background information on your facility.
- ♦ Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

Baxter Fenwal Division in Maricao, PR is a medical device facility dedicated to the manufacturing of whole blood collecting units.

Besides blood collection products, Baxter Maricao manufactures components including such operations as plastic extrusion, compounding, mixing, filling, sterilization, pasteurization, and final packing.

2 List the North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

325412

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility? If you checked "Yes" in question 3 and have fewer than 50 employees at your facility, then you are considered a "small facility" by the Performance Track Program.

- ☐ Fewer than 50
☐ 50-99
☐ 100-499
☒ 500-1,000
☐ More than 1,000

5 Complete the Environmental Requirements Checklist on pages 32-38 of the instructions and enclose it with your application.

Section A, continued

- 6 Optional: Is there anything else you would like to tell us about your facility? Do you participate in other voluntary programs at the local, tribal, State, or Federal level?

At Baxter Fenwal Division Maricao we are totally committed to continuous improvement not only with the manufacturing phase, but also with the environmental aspects of the business. We are committed to: pollution prevention process, corrective and preventive action systems, employee involvement, identification of environmental aspects, and management review. We have set goals for waste reduction, chemical management, emergency response, energy and water conservation. Wastewater discharge has continuously been reduced at the facility by installing an automatic sink water device and water-saving campaign. In addition, a recirculating system with cooling towers was installed to reuse the cooling water in the sterilization process. An evaporation system is in place to process and evaporate high BOD wastewater from the compounding and mixing operations. The concentrate from the evaporation process is handled and disposed as non hazardous waste. We have voluntary active participation with our employees and the community in outreach events such as our recycling program, community awareness recycling fair, Earth Day and others.

Why do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- ◆ Confirm that your EMS meets the Performance Track requirements.
- ◆ Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

Read the EMS requirements on page 9-12 of instructions.
Tell us if your EMS meets these requirements for:

- 1 Environmental policy _____ ☒ Yes ☐ No
- 2 Planning _____ ☒ Yes ☐ No
- 3 Implementing and operation _____ ☒ Yes ☐ No
- 4 Checking and corrective action _____ ☒ Yes ☐ No
- 5 Management review _____ ☒ Yes ☐ No
- 6 Have you done a comprehensive review of all activities conducted at your facility that could impact the environment? (i.e., have you done an aspect analysis?) ☒ Yes ☐ No
- 7 Have you classified your aspects based on their potential harm to the environment, on community concerns, and/or on other objective factors? (i.e., have you determined your significant aspects?) ☒ Yes ☐ No
- 8 When did you last update your aspect analysis? (mo/yr) 09/02
- 9 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes ☐ No
- 10 Did this cycle include both an EMS and a compliance audit? ☒ Yes ☐ No
- 11 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes ☐ No

If yes, what method of EMS assessment did you use?

Corporate & Division assessments

☐ GEMI

☐ CEMP

☒ Other Internal EMS audits

Third-party assessment

☒ ISO 14001 Certification

Other

Why do we need this information?

Facilities need to show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

Section C

Tell us about your past achievements and future commitments.

Part 1 You must report past achievements for at least two environmental aspects, and you must choose these aspects from the Environmental Performance Table on pages 29-31 of the instructions. Please quantify each of your aspects using the units listed for that aspect in the Environmental PTrack Information Hotline at 1-888-339-PTRK.

Note to small facilities: If you are a small facility, you must report past achievements for only one environmental aspect.

First achievement

1 What aspect have you selected from the Table on page 29-31?	Total Hazardous Waste	
2 What units are you using to quantify this aspect? (See Table, page 29-31.)	Lbs	
	PAST	CURRENT
3 List the past annual quantity of the aspect (from two years ago) and the current annual quantity of the aspect (from the most recent year for which you have data).	6,083	1,886
4 What are the years for which you are reporting these quantities?	2000	2002
5 Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	1.02	0.98
6 What is your normalizing factor based on (e.g., production, employment)?	Production	
7 You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?	We discontinued the manufacturing of Polyvinylidene fluoride (PVDF). We provided training to those persons that generate waste and the impact on the environment. We reduced the use of the absorbent sponge for the cyclohexanone operations in our production areas. We monitored the use of chemicals and the inventory, as well as expiration date, to avoid excessive hazardous waste disposal in our Chemical Lab.	

Section C, continued

Second achievement

1 What aspect have you selected from the Table on page 29-31?	Recycled/Reused Material	
2 What units are you using to quantify this aspect? (See Table, page 29-31.)	Tons	
	PAST	CURRENT
3 List the past annual quantity of the aspect (from two years ago) and the current annual quantity of the aspect (from the most recent year for which you have data).	963	860
4 What are the years for which you are reporting these quantities?	2000	2002
5 Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	1.02	0.98
6 What is your normalizing factor based on (e.g., production, employment)?	Production	
7 You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?	This performance results from reducing PVC scrap material that is generated in our production department. We recorded 10% of reduction from 2000 to 2002 because of quality improvements to the process, testing and rework. In addition, we have established a new reuse program for scrap material in the Heat Seal department. The 22% of the PVC scrap that is reused in our Baxter plant in Mexico represents 189 tons per year that is converted to finished product. In addition, we recycle approximately 160 tons of corrugated carton and 30 tons of PE and PP.	

Part 2 You must make future commitments for at least four environmental aspects, and you must choose these aspects from the Environmental Performance Table on pages 29-31 of the Instructions. The aspects you select for your future commitments should be related to the objectives and targets in your EMS. Where possible, they also should be identified as having a significant environmental impact in your EMS. No more than two of your aspects can be from the same environmental category. If you're not sure how your objectives and targets fit into our aspects or whether your aspects are significant, call the PTrack Information Hotline at 1-888-339-PTRK.

Once you have chosen your four environmental aspects, then fill in all the necessary information for these aspects in the tables on pages 7-10 of this form. Please quantify each of your aspects using the units listed for that aspect in the Environmental Performance Table. Each table that you must fill in corresponds to one of the environmental aspects you have chosen.

We will assume that your performance commitments are based on a constant production or employment level. If you would like to base your commitment on changing production or employment, please fill out optional questions 6a and 6b.

Note to small facilities: If you are a small facility, you must report future commitments for only two environmental aspects.

Section C, continued

First commitment

1	What aspect have you selected from the Table on pages 29-31?	Total Hazardous Waste	
2	What units are you using to quantify this aspect?	Lbs.	
3a	Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3b	If no, please explain why you believe this aspect should be included as a performance commitment.	Included	
		CURRENT	FUTURE
4	List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	1,818	1,500
5	What are the years for which you are reporting these quantities?	2002	2005
6a	(Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	0.95
6b	(Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
7	You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	Continue to train and provide awareness campaigns to those generating the waste and their impact in the environment. Continue monitoring hazardous waste generated in production areas. Reduce chemical inventory to avoid excessive use. Monitor inventory in order to avoid disposal of expired chemicals. Implement or identify solvent recycling company to reduce hazardous generation. Based in our trends, our goal is to be a Conditionally Exempt Small Quantity Generator (less than 220 pounds/month) rather than a Small Quantity (SQ) Generator.	
8a	Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
8b	If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	Conditionally Exempt SQ Generator: less than 220 pounds / month	

Section C, continued

Second commitment

1 What aspect have you selected from the Table on pages 29-31?	Total Solid Waste	
2 What units are you using to quantify this aspect?	Tons	
3a Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3b If no, please explain why you believe this aspect should be included as a performance commitment.	Included	
	CURRENT	FUTURE
4 List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	180	140
5 What are the years for which you are reporting these quantities?	2002	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	0.95
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	We will continue our effort to expand the recycling program 4 -6% by collecting additional recyclable material generated in our production line that is being disposed as compacted solid waste. Based on a recent study we found that more than 60% of the compacted solid waste can be recycled. This will require awareness campaigns and education to our employees that generate and collect this waste. This will represent 12,000 pounds per month. At present 86% of the total generation is recycled.	
8a Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
8b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	Reduce the total solid waste 20% for 2005 as compared with 2002. Reduce finished good product discard by 5%. Reduce disposal of special waste 5% That will be achieved by aggressive awareness campaign and the intervention and initiative of line employees.	

Section C, continued

Third commitment

1 What aspect have you selected from the Table on pages 29-31?	Energy Use	
2 What units are you using to quantify this aspect?	KWH	
3a Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3b If no, please explain why you believe this aspect should be included as a performance commitment.	Include	
	CURRENT	FUTURE
4 List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	15.7	14.7
5 What are the years for which you are reporting these quantities?	2002	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	0.95
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	<ul style="list-style-type: none"> • Turn off a/c that will not affect Production rooms • Turn off utilities when not needed to support production • Raise the Chiller temperature • Reduce compressed air pressure 10% • Correct air leakages • Turn off lighting & a/c at Warehouse #2 • Improve cooling tower for fans and speed • Installation of a Solar Panel for Tampering area • Variable Frequency Drive control for high capacity motors 	
8a Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
8b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	N/A	

Section C, continued

Fourth commitment

1 What aspect have you selected from the Table on pages 29-31?	Emission of VOCs	
2 What units are you using to quantify this aspect?	Lbs.	
3a Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3b If no, please explain why you believe this aspect should be included as a performance commitment.	NA	
	CURRENT	FUTURE
4 List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	9,913	7,050
5 What are the years for which you are reporting these quantities?	2002	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	0.95
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	We will continue our effort to reduce VOC emissions from our process by substitution of chemicals. We have a process that uses IPA for cleaning and sanitizing. We can obtain comparable results in certain applications, and replace the use of IPA with the use of a natural-based cleaner. This will eliminate approximately 700 pounds per year.	
8a Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
8b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	According to our air permit (synthetic minor source) VOC should not exceed more than 23,000 pound per year.	

Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- ♦ Describe your approach to public outreach.
- ♦ List three references who are familiar with your facility.

Section D

Tell us about your public outreach and reporting.

1 How do you identify and respond to community concerns?

A standard operating procedure (SOP) was implemented in order to document and track any concerns or complaints from our employees, contractors or community. The SOP is identified as SOP No. MA-01-01-014. This helps us in identifying non-conformances in our EMS and to achieve continuous improvement.

We attend meetings conducted by community groups such as Elementary School Recycling Club, municipal committee recycling meetings and others. Every year we hold an environmental fair in which the community and elementary schools are invited to participate. We invite speakers to discuss reforestation, energy saving and recycling.

Written awareness and educational billboards are posted on roadways in Maricao that describe the municipal recycling program. We conduct cleaning campaigns along roads and beaches. We sponsor the Maricao Forest by helping out with reforestation and construction materials for their projects.

2 How do you inform community members of important matters that affect them?

We are in close contact with the local Police, Fire Station, Emergency Response Office and municipal government. They make a walkthrough at least once a year in different areas that could present a potential emergency. In addition, the TIER-II report is submitted to the local agency, as well to EQB, every year with our chemical inventory of the plant and the layout where the inventory is stored. The Environmental Policy is posted in the entrance of the facility and is made available to the public upon request.

3 How will you make the Performance Track Annual Performance Report available to the public?

- ☒ Website www.baxter.com
- ☐ Newspaper
- ☒ Open Houses
- ☐ Other

Section D, continued

- 4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

- 5 List references below

	Organization	Name	Phone number
<i>Representative of a Community/ Citizen Group</i>	Local Emergency Office Response - Maricao Office	Mr. Alfredo Bonilla	787-838-3344
<i>State/tribal/local regulator</i>	Environmental Quality Board	Mr. Carmelo Vázquez	787-767-8181
<i>Other community/local reference (e.g., emergency management official or business associate)</i>	Department of Environmental and Natural Resources - Maricao Forest	Mr. Adrain Muñiz	787-838-1045

Section E

Application and Participation Statement.

On behalf of Baxter Fenwal, Maricao, PR
[my facility],

I certify that

I have read and agree to the terms and conditions for Application and Participation in the National Environmental Performance Track, as specified in the *National Environmental Performance Track Program Guide* and in the *Application Instructions*;

- I have personally examined and am familiar with the information contained in this Application, including the Environmental Requirements Checklist. The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Performance Track EMS requirements, including systems to maintain compliance with all applicable Federal, State, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all Federal, State, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable Federal, State, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date	_____
Printed Name/Title	<u>Mr./Mrs./Ms./Dr. Mr. Benjamin Padilla / Plant Manager</u>
Phone Number/E-mail	<u>787-838-3000</u>
Facility Name	<u>Baxter Healthcare, Fenwal Division</u>
Facility Street Address	<u>Road 357 Km. 0.8 P.O. Box 832</u>
City/State/Zip Code	<u>Maricao, PR, 00606</u>

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK (7875) or email ptrack@indecon.com.

To submit your application:

- 1) E-mail the completed application to ptrack@indecon.com,
and
- 2) Fax the completed and signed Section E (**not** the entire application) to
(617) 354-0463.

If you cannot e-mail the application, mail a hard copy of the entire completed application to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 40 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.